



**Winston H. Hickox**  
Secretary for  
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Protection

# State Water Resources Control Board

## Division of Water Quality

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**Gray Davis**  
Governor

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.  
For a list of simple ways you can reduce demand and cut your energy costs, see our website at <http://www.swrcb.ca.gov>.*

May 19, 2003

To: All Local Underground Storage Tank (UST) Program Managers, CUPA Agencies and Regional Board  
UST Program Managers

### **ENFORCEMENT ALERT: LABELING REQUIREMENTS**

The purpose of this enforcement alert is to request your cooperation in discovering violations of the labeling requirements for underground storage tank (UST) components. Title 23, Chapter 16, Section 2631(b) of the California Code of Regulations requires all UST components to be approved by an independent testing organization if installed after the following dates: July 1, 1991 for underground storage tanks, January 1, 1992 for piping, and January 1, 1995 for all other UST system components. Section 2631(b) further requires that the exterior surface of the UST be marked, stamped, or labeled to indicate approval. It has come to the attention of State Water Resources Control Board staff that some manufacturers may be failing to comply with the labeling requirements of Section 2631(b).

Most manufacturers meet the requirements of Section 2631(b) through testing and approval by Underwriters Laboratories Inc. (UL) or Underwriters Laboratories Inc. – Canada (ULC). UL and ULC identify those products that they have tested and approved by allowing the manufacturer to apply a UL or ULC stamp or mark on the product. Manufacturers must purchase the right to emboss or stamp an approved product with the UL or ULC mark. Other independent testing organizations may use a similar procedure.

We have learned that some manufacturers either may be affixing “homemade” labels in the field or may not be marking the components at all. Failure to appropriately mark components is a violation of Section 2631(b) and may also violate manufacturers’ agreements with UL and ULC and void the UL/ULC approval. If a manufacturer claims that their components are UL or ULC certified, yet there is no UL or ULC sticker or mark on a component, UL/ULC may require a field inspection by a UL/ULC representative. They may also require lab testing of the component to ensure the product meets their organization’s listing requirements.

Please inform all your UST inspectors to be alert for a UL, ULC, or an independent testing organization approval mark. For more information about UL, including a picture of their mark, please visit [www.ul.com](http://www.ul.com). For more information about its sister organization, ULC, please visit [www.ulc.com](http://www.ulc.com).

If you or your inspectors come across any unmarked product piping or other UST components, or if you see a field-installed or “homemade” approval, please contact Mr. Michael Sahlin of the UST Enforcement Unit at (916) 341-5864 or email him at [sahlinm@swrcb.ca.gov](mailto:sahlinm@swrcb.ca.gov). If you have any questions, please contact me at (916) 341-5810.

Sincerely,

*[Original Signed By]*

Leslie J. Alford  
Chief, UST Enforcement Unit

**California Environmental Protection Agency**

